

JJHCS APPENDIX B IN SUPPORT OF MOTION TO SEAL
PORTIONS OF MOTION TO COMPEL PRE-APRIL 2016 DISCOVERY (ECF NOS. 350, 354, & 361)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. Esq. in Opposition to Plaintiff Johnson & Johnson Health Care Systems Inc.'s Motion to Compel Pre-April 2016 Discovery, dated August 22, 2024 (ECF No. 354)</u>		JJHCS requests the redaction of information in and exhibits to the August 22 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the August 22 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary information to the public would cause irreparable harm to JJHCS because it would place	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 3-4	Various redactions discussing confidential exhibits					
Exhibits 4, 7, & 8	Sealing of emails and attachments related to confidential business information and strategy					

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			JHCS at a competitive disadvantage if its competitors secured the information.			
<u>Letter from Jeffrey J. Greenbaum in reply to Motion to Compel Pre-April 2016 Discovery, dated August 29, 2024 (ECF No. 361)</u>		JJHCS requests the redaction of information and discussion in the August 29 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that this discussion and exhibits contain sensitive business information.	If filed on the public docket, these portions of the August 29 letter would reveal confidential material relating to JJHCS's sensitive business information. Disclosure of this confidential and proprietary	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 4	Redactions discussing confidential exhibits					

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			information to the public would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.			